

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mondaire Jones, Alessandra Biaggi, Chris Burdick, Stephanie Keegan, Seth Rosen, Shannon Spencer, Kathy Rothschild, Diana M. Woody, Perry Sainati, Robert Golub, Mary Winton Green, Marsie Wallach, Matthew Wallach, Mac Wallach, Carol Sussman, and Rebecca Rieckhoff,
individually, and on behalf of all others similarly situated,

Plaintiffs,

No 20 Civ. 6516 (VM)

v.

United States Postal Service, Louis DeJoy, as Postmaster General of the United States Postal Service, and Donald J. Trump, as President of the United States,

Defendants.

SUPPLEMENTAL DECLARATION OF ANGELA CURTIS


I, Angela Curtis, under penalty of perjury and in lieu of affidavit as permitted by 28 U.S.C. § 1746, hereby state as follows:

1. On September 8, 2020, I submitted a declaration in opposition to plaintiffs' motion for a preliminary injunction in the above-captioned matter. I am submitting this supplemental declaration to clarify footnote 1 of that declaration. I submit this supplemental declaration based on information available to me in the course of my duties at USPS, including information provided to me by other United States Postal Service ("USPS") officials with whom I work.
2. The July 10, 2020 Stand-Up Talk ("SUT") discussed in footnote 1 of my declaration is recognizable as a locally prepared document, and therefore a document that was not prepared by Headquarters. I do not have more detailed personal knowledge of how the SUT was prepared.
3. I participated in a July 10, 2020 teleconference conducted with Area Vice Presidents ("AVPs") and members of Headquarters. During that teleconference, members of Headquarters made statements reflected, in part, in the July 10, 2020 SUT.
4. My understanding of USPS policy in July 2020 and since has always been that Headquarters has not banned late or extra trips. In the days immediately following the July 10, 2020, teleconference, members of Headquarters issued further explanations of USPS policy, including to AVPs, making clear that certain statements reflected in the July 10, 2020 SUT were not accurate statements of USPS policy. On July 14, 2020, Headquarters provided final guidelines explaining when extra trips could be taken, confirming that extra trips remained authorized under certain circumstances. Nor are

late or extra trips banned, rather they continued (albeit at a reduced level) both in July and today.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed at Washington, D.C. on this 15th day of September, 2020



ANGELA CURTIS